

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtor.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
PUERTO RICO ELECTRIC POWER AUTHORITY

Debtor.

PROMESA Title III
Case No. 17-BK-4780 (LTS)

URGENT UNOPPOSED MOTION OF SREAEE FOR LEAVE TO FILE SUR-REPLY

To the Honorable Court:

COMES NOW, Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica ("SREAEE"), creditor and party in interest, through its undersigned attorneys, hereby respectfully submits this Urgent Unopposed Motion for Leave to File a Sur-reply.

1. On May 14, 2018, the Official Committee of Retirees (the "Retiree Committee") filed a motion requesting an Order providing for the representation of PREPA retirees in PREPA's Title III case (Docket # 824).

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. On May 25, 2018, SREAAE filed an Objection to the Retiree Committee's Motion (the "Objection", Docket # 844), SREAAE stated in its Objection that it is willing and able to appear and represent the retirees' interests in PREPA's Title III case.

3. On May 30, 2018, the Retiree Committee filed a *Reply in Support of Motion of the Official Committee of Retired Employees of the Commonwealth of Puerto Rico Regarding Representation of PREPA Retirees* (the "Reply", Docket # 853). In its Reply, the Retiree Committee mentions some documents and/or information it requested from SREAAE and raised its concern about alleged possible inherent conflicts that preclude SREAAE from representing the interests of all PREPA Retirees.

4. SREAAE respectfully requests a leave to file a sur-reply of no more than 5 pages. The sur-reply will be filed no later than June 1, 2018, at 4:00 pm.

5. SREAAE certifies that it has reached out to counsels for the Retiree Committee and that such party does not object to SREAAE's request. A proposed order is attached as Exhibit A.

In Ponce, Puerto Rico, this 1st day of June, 2018.

I HEREBY CERTIFY that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. Paper copies have been mailed pursuant to Section II of the *Fourth Amended Notice, Case Management and Administrative Procedures*:

- (i) Chambers of the Honorable Laura Taylor Swain (two copies shall be delivered to the chambers):
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Suite No. 3212
New York, New York 10007-1312;
- (ii) Office of the United States Trustee for Region 21
Edificio Ochoa, 500 Tanca Street, Suite 301
San Juan, PR 00901-1922



PO Box 10779
Ponce, Puerto Rico 00732
Tel: (787) 848-0666
Fax: (787) 841-1435

//s/Rolando Emmanuelli Jiménez
USDC: 214105

/s/Yasmín Colón Colón
USDC: 230814

/s/Jessica E. Méndez Colberg
USDC: 302108

Emails: rolando@bufete-emmanuelli.com
yasmin@bufete-emmanuelli.com
notificaciones@bufete-emmanuelli.com

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtor.²

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
PUERTO RICO ELECTRIC POWER AUTHORITY

Debtors.

PROMESA Title III

Case No. 17-BK-4780 (LTS)

**ORDER GRANTING URGENT UNOPPOSED MOTION OF SREAEE FOR
LEAVE TO FILE SUR-REPLY**

Upon the *Urgent Unopposed Motion of SREAEE for Leave to File a sur-reply* (the “Urgent Motion”), and there being no objections, it is **HEREBY ORDERED THAT:**

1. The Urgent Motion is granted.
2. SREAEE may file a sur-reply brief of no more than 5 pages, excluding case caption, signature pages, and any exhibits, no later than June 1, 2018 at 4:00 p.m. (Atlantic Standard Time).

² The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

3. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

SO ORDERED.

Dated: _____
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
United States District Judge